

HARDIN THOMPSON, P.C.

Michael F. Schleigh, Esquire

PA Attorney #88407

Wells Fargo Building

123 S. Broad Street, Suite 2235

Philadelphia, Pennsylvania 19109

Direct: (267) 459-8366 | Fax: (267) 486-9002 | Email: mschleigh@hardinlawpc.net

Counsel for Defendant, County of Delaware

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

HECTOR FIGUEROA

Plaintiff,

vs.

COUNTY OF DELAWARE

Defendant.

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CIVIL ACTION

Case No. 2:23-cv-00515

NOTICE OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Defendants, County of Delaware, by its counsel, Hardin Thompson, PC, hereby moves this Honorable Court to enter an Order dismissing Plaintiff's Complaint pursuant to Fed. R. Civ. P. 56. The grounds for this Motion are set forth in the accompanying Statement of Materials Facts and attached Exhibits thereto, and Memorandum of Law, which is incorporated by reference herein. Oral argument is respectfully requested if opposition is filed.

Respectfully Submitted,

HARDIN THOMPSON, PC



BY: Michael F. Schleigh, Esquire
Counsel for Defendant, County of Delaware

DATED: January 30, 2024

HARDIN THOMPSON, P.C.

Michael F. Schleigh, Esquire

PA Attorney #88407

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the attached Motion to Dismiss and accompanying Brief with Proposed Order were served upon the following, THIS DAY, by ECF filing as indicated below:

Noah S. Cohen, Esq.
Weir Greenblatt Pierce LLP
1339 Chestnut Street, Suite 500
Philadelphia, PA 19107
(ncohen@wgpllp.com)

Respectfully Submitted,

HARDIN THOMPSON, PC

A handwritten signature in blue ink, reading "Michael F. Schleigh", is positioned above a horizontal line.

BY: Michael F. Schleigh, Esquire
Counsel for Defendant, County of Delaware

DATED: January 30, 2024